



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN 15 2016

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7663 5967
RETURN RECEIPT REQUESTED

Mr. Brian Roper
Director of Environmental, Health and Safety
EMCO Chemical Distributors, Inc.
2100 Commonwealth Avenue
North Chicago, Illinois 60064

Re: Notice of Violation
Compliance Evaluation Inspection
ILD 005 070 495

Dear Mr. Roper:

On July 23, 2015 a representative of the U.S. Environmental Protection Agency inspected the EMCO Chemical Distributors, Inc. (EMCO) facility located in North Chicago, Illinois. As a "large quantity generator" of hazardous waste, EMCO is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate EMCO's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by EMCO, EPA's review of records pertaining to EMCO, and the inspector's observations, EPA has determined that EMCO has unlawfully stored hazardous waste without a permit or interim status as a result of EMCO's failure to comply with certain conditions for a permit exemption under Ill. Admin. Code tit. 35 § 722.134(a)-(c) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which EMCO was out of compliance at the time of the inspection in paragraphs 1 through 6, below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in paragraphs 5 and 6 are also independent TSD requirements incorporated from Ill. Admin. Code tit. 35 Part 725. Accordingly, each failure of EMCO to

comply with these conditions is also a violation of the corresponding requirement in Ill. Admin. Code tit. 35 Part 725 [40 C.F.R. Part 265] (if the facility should have fully complied with the requirements for interim status), or Ill. Admin. Code tit. 35 Part 724 [40 C.F.R. Part 264] (if the facility should have been permitted).

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

1. Over 90 Day Storage

Under Ill. Admin. Code tit. 35 § 722.134(b) [40 C.F.R. § 262.34(b)], a generator who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to the requirements of 40 CFR parts 264 and 265 and the permit requirements of 40 CFR part 270.

At the time of the inspection, EMCO was storing two totes in a storage area near the laboratory for over 90 days, having accumulation start dates of 1/6/2015 and 4/8/2015. *See*, page 3, paragraph 5, of the Inspection Report; and pages 5 and 6, photographs 9 through 12 of the Photograph Log.

In addition, EMCO was storing five 55-gallon containers of hazardous waste in the Waste Pad Storage Area for over 90 days, having accumulation start dates of 2/13/15, 10/28/14, 3/10/15, 8/21/14 and 3/10/15. *See*, page 4, paragraph 2, of the Inspection Report; and pages 11 through 14, photographs 22, 23, 27, 28 and 31, of the Photograph Log.

2. Satellite Accumulation

Under Ill. Admin. Code tit. 35 § 722.134(c)(1) [40 C.F.R. § 262.34(c)(1)], a generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste without a permit or interim status. A generator who accumulates more than 55 gallons in containers must comply with the requirements of 35 §§ 722.134(a) and 725 Subpart I [40 C.F.R. §§ 262.34(a) and 265 Subpart I] with respect to the excess amount.

At the time of the inspection, EMCO was storing six 55-gallon containers of hazardous waste in one satellite accumulation area (SAA), and three 55-gallon containers of hazardous waste in another separate SAA. Both areas were located in the Production Fill Room. *See*, page 3, paragraph 4, of the Inspection Report; and pages 3 to 4, photographs 6 through 8 of the Photograph Log.

In addition, EMCO was storing 14 totes of hazardous waste in a storage area, located near the laboratory, in what EMCO considered to be an SAA. Seven totes of hazardous waste were being stored in a separate SAA, located near the laboratory. *See*, page 3, paragraphs 5 and 6, of the Inspection Report; and pages 5 to 7, photographs 9 through 12 and 13, 14, of the Photograph Log.

3. Accumulation Date

Under Ill. Admin. Code tit. 35 § 722.134(a)(2) [40 C.F.R. § 262.34(a)(2)], the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

At the time of the inspection, EMCO was storing seven totes of hazardous waste, located near the laboratory, without marked dates of accumulation. *See*, page 3, paragraph 6, of the Inspection Report; and page 7, photographs 13, 14, of the Photograph Log.

In addition, EMCO was storing seven 55-gallon containers of hazardous waste in the Waste Pad Storage Area, without marked dates of accumulation. *See*, page 4, paragraph 2 of the Inspection Report; and pages 9 to 13, photographs 18, 20, 21, 24, 25 and 26, of the Photograph Log.

EMCO was also storing three totes of hazardous waste in the Waste Pad Storage Area, without marked dates of accumulation. *See*, page 4, paragraph 4 of the Inspection Report; and pages 18 and 19, photographs 36, 37 and 38, of the Photograph Log.

4. Hazardous Waste Labeling

Under Ill. Admin. Code tit. 35 § 722.134(a)(3) [40 C.F.R. § 262.34(a)(3)], each container and tank is labeled or marked clearly with the words, "Hazardous Waste," while being accumulated on-site.

At the time of the inspection, EMCO was storing seven totes of hazardous waste, located near the laboratory, without the words, "Hazardous Waste," marked on the containers. *See*, page 3, paragraph 6, of the Inspection Report; and page 7, photographs 13, 14, of the Photograph Log.

In addition, EMCO was storing four 55-gallon containers of hazardous waste in the Waste Pad Storage Area, without the words, "Hazardous Waste," marked on the containers. *See*, page 4, paragraph 4 of the Inspection Report; and pages 18 and 19, photographs 36, 37 and 38, of the Photograph Log.

5. Contingency Plan

Under Ill. Admin. Code tit. 35 § 722.134(a)(4); Subpart D, 35 § 725.153(a) [40 C.F.R. § 262.34(a)(4); Subpart D, § 265.53(a)], a copy of the contingency plan and all revisions to the plan must be maintained at the facility.

At the time of the inspection, EMCO was not maintaining a copy of the Contingency Plan at the facility. *See*, page 5, item 4, Contingency Plan, of the Inspection Report.

6. Inspections

Under Ill. Admin. Code tit. 35 §§ 722.134(a)(1)(A) and 725.274 [40 C.F.R. §§ 262.34(a)(1)(i) and 265.174], at least weekly, the owner or operator must inspect areas where containers are stored.

At the time of the inspection, EMCO was not conducting weekly inspections of the tote storage area near the laboratory, or in the Waste Pad Storage Area. *See*, page 6, item 7, Weekly and Daily Inspections, of the Inspection Report.

Summary: By failing to comply with the conditions for a permit exemption, above, EMCO became an operator of a hazardous waste storage facility, and was required to obtain an Illinois hazardous waste storage permit. EMCO failed to apply for such a permit. EMCO's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ill. Admin. Code tit. 35 §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725 is also an independent violation of the corresponding TSD requirement.

OTHER VIOLATIONS

7. Hazardous Waste Determination

Under Ill. Admin. Code tit. 35 §§ 722.111 [40 C.F.R. § 262.11], a generator must determine whether its waste is hazardous.

At the time of the inspection, EMCO had not made a determination whether the wastes, being stored in fifteen 55-gallon containers, located in the Waste Pad Storage Area, were hazardous. *See*, page 4, paragraph 2, of the Inspection Report; and pages 15 and 19, photographs 30 and 35, of the Photograph Log.

8. Manifests

Under Ill. Admin. Code tit. 35 § 722.140(a) [40 C.F.R. § 262.40(a)], a generator must keep a copy of each manifest signed in accordance with 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

At the time of the inspection, EMCO did not have and was unable to provide final signed copies of manifests from the treatment, storage and disposal facility (TSDF), which received its waste, for three manifests. *See*, page 5, item 2, Manifests, of the Inspection Report.

9. Exception Report

Under Ill. Admin. Code tit. 35 § 722.142(a)(2) [40 C.F.R. § 262.42(a)(2)], a generator of greater than 1000 kilograms of hazardous waste in a calendar month must submit an Exception Report to the Agency (Illinois Environmental Protection Agency) if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

At the time of the inspection, EMCO did not submit an Exception Report to the Illinois Environmental Protection Agency for not receiving three signed manifests from the TSDF, which received its waste. *See*, page 5, item 2, Manifests, of the Inspection Report.

10. Land Disposal Notification

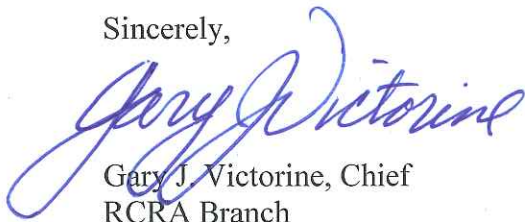
Under Ill. Admin. Code tit. 35 IAC § 728.107(a)(8) [40 CFR § 268.7(a)(8)], a generator of hazardous waste must retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to Land Disposal Restrictions.

At the time of the inspection, EMCO did not maintain a copy of the land disposal restriction notification for the hazardous waste that is the subject of such documentation. *See*, page 5, item 3, Waste Analysis and Recordkeeping, of the Inspection Report.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than thirty (30) days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions and requirements. You should submit your response to Ms. Jamie Paulin, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Paulin, of my staff, at 312-886-1771, or at paulin.jamie@epa.gov.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois EPA, (todd.marvel@illinois.gov)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: EMCO Chemical Distributors, Inc.

EPA ID No.: ILD 005 070 495

LOCATION ADDRESS: 2100 Commonwealth Avenue
North Chicago, Illinois 60064

NAICS CODE(S): 424690 [Other Chemical and Allied Products Merchant
Wholesalers]

DATE OF INSPECTION: July 23, 2015

EPA INSPECTOR: Jamie L. Paulin
Chemist
LR-8J
Compliance Section 1
(312) 886-1771 Direct
(312) 353-4788 Facsimile
paulin.jamie@epa.gov

PREPARED BY: Jamie Paulin
Jamie L. Paulin
Chemist

APPROVED BY: Michael Cunningham
Michael Cunningham, Section Chief
Compliance Section 1
RCRA Branch

10/27/15
Date

11-4-15
Date

INTRODUCTION:

The purpose of the inspection was to conduct an un-announced Compliance Evaluation Inspection (CEI) at the EMCO Chemical Distributors, Inc. (EMCO) facility, located at 2100 Commonwealth Avenue, North Chicago, Illinois, to examine EMCO's management of its Resource Conservation and Recovery Act (RCRA) regulated waste, and to determine EMCO's compliance with RCRA, including used oil regulations.

- EMCO notified EPA of its hazardous waste activities as a large quantity generator in March, 1994.
- EMCO operates a chemical blending process, distributes chemicals, and packages chemicals. They operate a waste water treatment unit (WWTU) and also manage universal waste.
- EMCO was inspected by EPA on 6/16/2005 and was determined to be a significant non-complier. On 9/27/2007, they were returned to compliance status.
- EMCO employs about 150 people and operates 5-6 days per week with two shifts working Monday through Thursday.

OPENING CONFERENCE:

I entered the EMCO facility at 10:30am on July 23, 2015. I introduced myself, presented my credentials, and described the purpose of my visit. The security office contacted Michael Schlie, Regulatory Compliance - EH&S, to escort me on the inspection.

I provided a Small Business Resources Information Sheet to him during our opening conference. Mr. Schlie did not make a CBI claim on the information gathered during the inspection or on the photos taken, documents copied and/or verbal information provided.

Mr. Schlie explained that Mr. Brian Roper, Director EH&S, was not present at the North Chicago facility because he manages environmental affairs at all of EMCO's facilities and was working at another facility the day of the inspection.

We discussed that the North Chicago plant is a custom packing facility. They blend chemicals at the site and perform packaging. They collect hazardous waste from the blending lines and from the laboratory and store the waste in containers and not in tanks. The hazardous wastes generated carry the waste codes of D001, D002, F003, F005, D039 and D035.

After our discussion, we began the physical site inspection immediately following the opening conference

SITE INSPECTION:

Mr. Schlie escorted me on the physical site inspection, which began near collection of non-hazardous waste in a 55-gallon container. *See*, photograph 1.

We then entered the SA01 Building where universal waste and electronic waste was being stored. *See*, photographs 2 and 3.

From the SA01 Building, I inspected the maintenance area. There was one satellite accumulation area (SAA) container of hazardous waste being stored here. Mr. Schlie explained that the waste being stored was part-related waste. The other 55-gallon container was storing non-hazardous waste anti-freeze. *See*, photographs 4 and 5.

Mr. Schlie showed me the Production Fill Room. The Production Fill Room was located a step or two lower from the main floor. Facing the inside of the room, six 55-gallon containers of hazardous waste were being stored next to each other on the left side of the room. Mr. Schlie stated that this area was a satellite accumulation area and not a 90-day storage area. In the middle of the room, three 55-gallon containers of hazardous waste were being stored next to each other also described by Mr. Schlie as SAA containers. On the right side of the room, one 55-gallon container of hazardous waste was being stored as an SAA container. *See*, photographs 6 through 8.

I was then escorted to the Laboratory by Mr. Schlie. Fourteen totes of hazardous waste, labeled as hazardous waste and as "acid trash" were being kept in a storage area near the laboratory. Two of the fourteen totes had been stored on-site over 90 days, having dates of 1/6/2015 and 4/8/2015. Mr. Schlie explained that they considered the area to be an SAA and so no weekly inspections were being conducted. *See*, photographs 9 through 12.

In the room adjacent to the tote storage, seven totes of hazardous waste were being stored open and without dates of accumulation or the words, "Hazardous Waste." The wastes were identified by words painted on the floor, such as flammable trash or caustic trash. Some of the totes were over-flowing with bags of hazardous waste and were not able to be closed. These wastes were generated at the lab as any type of contaminated lab waste. *See*, photographs 13 and 14.

In the actual laboratory an SAA container storing hazardous waste was located under a hood. The container was not closed; however the lab manager put the lid on the container at the time of the inspection. *See*, photographs 15 and 16.

Mr. Schlie then showed me the Waste Pad Storage Area, which was located outside of the facility. Mr. Nick Ruszczak, Waste Coordinator, then joined us and showed me the storage containers. In the front of the area, closest to the building, several 55-gallon containers of waste were being stored. Mr. Ruszczak explained that this was pending waste from a "clean out." EMCO had just sent a sample to a laboratory for analysis to determine if it is hazardous waste. The storage area has several pits located within the ground. Mr. Ruszczak explained that the pits

collect rain water and were present in case of a spill. Periodically, the pits are cleaned out and the material is collected as waste and stored as "Pending," until a sample is analyzed for waste determination. *See*, photographs 17 and 19.

As I walked through the stacked containers, I noticed that some rows of 55-gallon containers were single stacked and some were double stacked.

Approximately 148 x 55-gallon containers of hazardous waste were being stored in the area. The following information was noted (*See*, photographs 18, 20 through 28, and 30, 31, 32):

- Three of the 55-gallon containers did not have a date of accumulation located on them. (*See*, photographs 18, 21, and 26)
- Four of the 55-gallon containers did not have a date of accumulation or the words, "Hazardous Waste," located on them. (*See*, photographs 20, 24, and 25)
- Four of the 55-gallon containers had been stored over 90 days, having dates of 2/13/15, 10/28/14, 3/10/15, and 8/21/14. Mr. Ruszczak stated that EMCO had no method of disposal of the containers so they would need to continue to be stored until they found a disposal company who could take them. The containers were labeled "Cat Trash." (*See*, photographs 22, 23, 27, and 28)
- One of the 55-gallon containers had been stored over 90 days, having a date of 3/10/15. This container was labeled as, "Paint Related Waste." (*See*, photograph 31)
- Six 55-gallon containers were being stored in the area without a date of accumulation or the words, "Hazardous Waste." EMCO stated that these were pending analysis to determine if they were hazardous. (*See*, photograph 30)
- Two open 55-gallon containers of hazardous waste were being stored without dates of accumulation. Mr. Ruszczak did put a date of accumulation on each container and put a cap on them at the time of the inspection. (*See*, photographs 32 and 33)
- Nine of the 55-gallon containers of waste were being stored with no dates of accumulation or the words, "Hazardous Waste." EMCO states that they were waiting analysis for hazard determination. (*See*, photograph 35)

Several 55-gallon containers of sampled product were also being stored in this area. *See*, photographs 29 and 34.

Totes of hazardous waste generated from the laboratory were also being stored in this area. Approximately 16 totes were being double stacked on pallets. Three of the totes did not have a date of accumulation. *See*, photographs 36, 37 and 38.

The aisle space was too small for me to fit through in order to inspect all of the labels. *See*, photograph 39.

A grated pallet was being stored here that was sometimes used for storage and collection of spills. There was a free liquid inside of the pallet. Another pit located within the ground was also located here. Mr. Ruszczak stated that the pit collects rain water and is present in case of spills.

Periodically EMCO collects the material in the pit and has it analyzed for hazard determination. *See*, photographs 41 and 42.

Lastly three 55-gallon containers of wash solvent were also being stored in this area. Mr. Ruszczak mentioned that EMCO will either re-use the wash solvent or sell it. *See*, photograph 43.

This area was the last to be inspected. We returned to the front office to complete the records review.

RECORDS REVIEW:

Mr. Schlie aided me in the review of the hazardous waste records after completing the physical site inspection.

1. Personnel Training

EMCO did not have RCRA training records on site at the time of the inspection. Mr. Roper sent me an email on 8/24/15 stating that he would send me copies of the records. I did receive the documents on 10/29/15. The delay was due to email issues.

The training records were complete and there was documentation of annual training for the years 2015 and 2014.

2. Manifests

I reviewed the manifests of the hazardous waste shipments for the years 2013, 2014 and 2015. A final signed copy from the TSD was not in the records for three of the manifests as listed below:

3/7/14 012224847 JJK
4/4/14 012224901 JJK
11/14/14 012265175 JJK

3. Waste Analysis and Recordkeeping

I observed that EMCO did not have, as a record on-site, a land disposal restriction (LDR) notification form for shipments of hazardous waste.

4. Contingency Plan

A Contingency Plan was not available for my review during the inspection. Mr. Roper sent me an email on 8/24/15 stating that he would send me a copy of the contingency plan. I did

receive the Contingency Plan to review on 10/29/15. The delay was due to email issues.

The Contingency Plan contained all of the elements required under 35 IAC 725.152 [40 CFR § Section 265.52].

5. Preparedness and Prevention

Agreements with local emergency authorities, contractors, or local hospitals were not available for my review during the inspection. Mr. Roper sent me an email on 8/24/15 stating that he would send me a copy of the agreements. I did receive the agreements to review on 10/29/15. The delay was due to email issues.

6. Annual Reporting

EMCO did not have copies of annual reports at the time of the inspection. Mr. Roper sent me an email on 8/24/15 stating that he would send me the documents. I did receive copies of the reports to review on 10/29/15. The delay was due to email issues.

EMCO had filed an annual report with IEPA by March 1 for the reporting years 2012, 2013 and 2014.

They are currently listed as an LQG within the EPA's RCRAInfo database.

7. Weekly and Daily Inspections

EMCO was not conducting weekly inspections of the hazardous waste storage areas.

CLOSING CONFERENCE:

I conducted the closing conference with Mr. Schlie. I explained to him that I would need to review my notes and photographs before making any compliance decisions. I also explained that I would submit a copy of my inspection report along with the photo log to EMCO.

I also explained to Mr. Schlie that the amount of hazardous waste in an SAA is limited to 55-gallons. The amounts that were being stored in the laboratory and in the Production Fill Room were greater than 55 gallons.

Additionally, I asked Mr. Schlie to send me the following documents as soon as possible, since he could not obtain the documents at the time of the inspection:

1. RCRA Training records for last 3 years, including.
 - a. Written description of the type and amount of training.
 - b. Documentation of annual training.

- c. Job titles for each position related to hazardous waste management.
- d. Written job descriptions for each position above.
- e. Documentation that new employees are trained within 6 months.
2. Copy of the contingency plan.
3. Copies of any arrangements made with local authorities.
4. Copies of the hazardous waste annual reports filed by March 1, for the last 3 years.

Note: I sent an email to Mr. Schlie on 8/21/15 asking him to send me the documents for review. I received an email from Mr. Roper on 8/24/15 stating that he would send me the documents for review by the end of that week. I did receive the documents on 10/29/15. The delay was due to email issues.

I departed EMCO around 2:00pm.

ATTACHMENT: (2)

Attachment 1	Photographs taken during the time of the inspection.
Attachment 2	Inspection Check list

Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 1
Photo Filename DSCN0856.JPG
Date/Time 7/23/2015
11:23:00 AM
Photographer Jamie Paulin

Description

Non-hazardous waste storage 55-gallon container.



Disk Number 1
Photo Number 2
Photo Filename DSCN0857.JPG
Date/Time 7/23/2015
11:28:00 AM
Photographer Jamie Paulin

Description

SA01 Building. Universal waste and e-waste storage area.



Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 3
Photo Filename DSCN0858.JPG
Date/Time 7/23/2015
11:28:00 AM
Photographer Jamie Paulin

Description

SA01 Building. Universal waste and e-waste storage area.



Disk Number 1
Photo Number 4
Photo Filename DSCN0859.JPG
Date/Time 7/23/2015
11:31:00 AM
Photographer Jamie Paulin

Description

Maintenance area. Satellite Accumulation Area (SAA). Part-related waste.



Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 5
Photo Filename DSCN0860.JPG
Date/Time 7/23/2015
11:32:00 AM
Photographer Jamie Paulin

Description

Maintenance Area. Non hazardous waste anti-freeze.



Disk Number 1
Photo Number 6
Photo Filename DSCN0861.JPG
Date/Time 7/23/2015
11:35:00 AM
Photographer Jamie Paulin

Description

Production Fill Room SAA containers. Six 55-gallon containers of hazardous waste were stored next to each other.



Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 7
Photo Filename DSCN0862.JPG
Date/Time 7/23/2015
11:37:00 AM
Photographer Jamie Paulin

Description

Production Fill Room. An SAA container of hazardous waste was being stored in this location.



Disk Number 1
Photo Number 8
Photo Filename DSCN0863.JPG
Date/Time 7/23/2015
11:42:00 AM
Photographer Jamie Paulin

Description

Production Fill Room. Three 55-gallon containers of hazardous waste were being stored near each other.



Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 9
Photo Filename DSCN0864.JPG
Date/Time 7/23/2015
11:57:00 AM
Photographer Jamie Paulin

Description

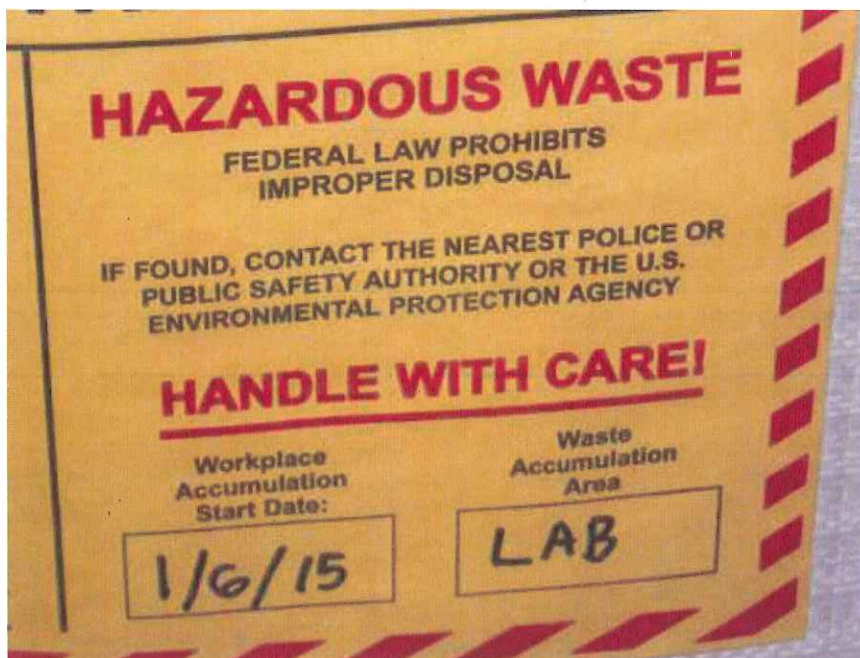
Laboratory. One tote of hazardous waste was being stored in this location. The date on the label was 1/6/15, over the 90 day storage time. No weekly inspections were being done in this area.



Disk Number 1
Photo Number 10
Photo Filename DSCN0865.JPG
Date/Time 7/23/2015
11:57:00 AM
Photographer Jamie Paulin

Description

Laboratory. One tote of hazardous waste was being stored in this location. The date on the label was 1/6/15, over the 90 day storage time. No weekly inspections were being done in this area.



Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 11
Photo Filename DSCN0866.JPG
Date/Time 7/23/2015
11:57:00 AM
Photographer Jamie Paulin

Description

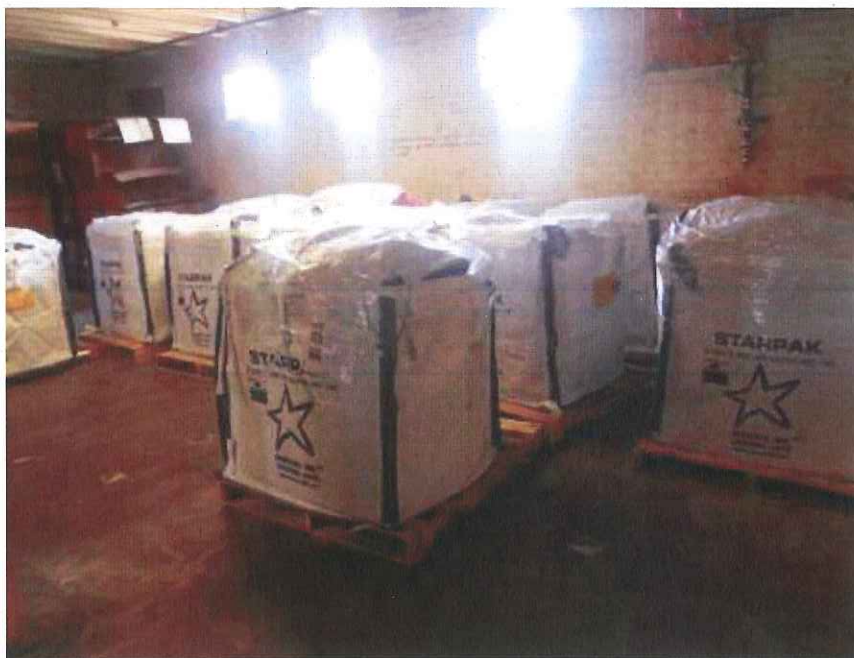
Laboratory. One tote of hazardous waste was being stored in this location. The date on the label was 4/8/15, over the 90 day storage time. No weekly inspections were being done in this area.



Disk Number 1
Photo Number 12
Photo Filename DSCN0867.JPG
Date/Time 7/23/2015
11:57:00 AM
Photographer Jamie Paulin

Description

Laboratory. Fourteen totes of hazardous waste were being stored as SAA containers. No weekly inspection was being performed in this area.



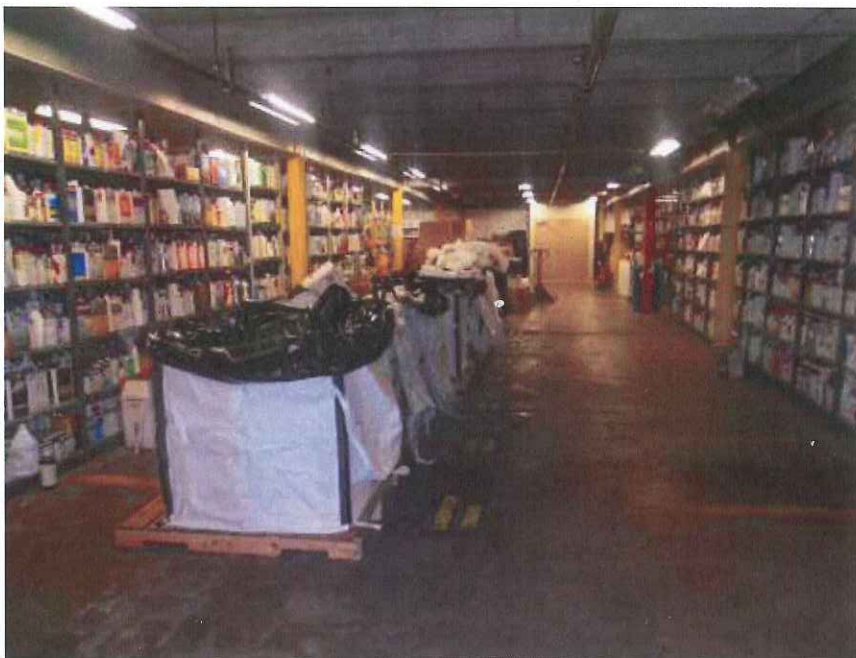
Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 13
Photo Filename DSCN0868.JPG
Date/Time 7/23/2015
11:58:00 AM
Photographer Jamie Paulin

Description

Laboratory. Seven totes of hazardous waste were being stored in this location open and not labeled with the dates of accumulation or the words, "Hazardous Waste."



Disk Number 1
Photo Number 14
Photo Filename DSCN0869.JPG
Date/Time 7/23/2015
11:59:00 AM
Photographer Jamie Paulin

Description

Laboratory. Seven totes of hazardous waste were being stored in this location open and not labeled with the dates of accumulation or the words, "Hazardous Waste." The waste was identified by words on the floor but not as hazardous waste.



Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 15
Photo Filename DSCN0870.JPG
Date/Time 7/23/2015
12:01:00 PM
Photographer Jamie Paulin

Description

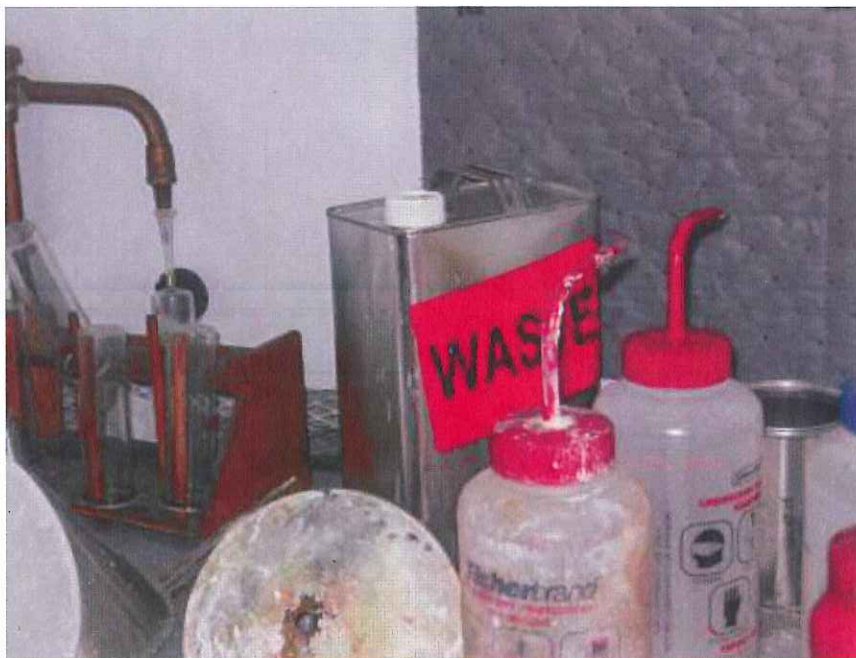
Laboratory. Waste containers located under a hood. The SAA container was not closed.



Disk Number 1
Photo Number 16
Photo Filename DSCN0871.JPG
Date/Time 7/23/2015
12:04:00 PM
Photographer Jamie Paulin

Description

Laboratory. SAA container of hazardous waste. Emco put the cap back onto the container at the time of the inspection.



Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 17
Photo Filename DSCN0872.JPG
Date/Time 7/23/2015
12:14:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. Pending waste was collected from "clean-out," and being stored in this location. Emco has sent out a sample for analysis to determine if it is hazardous waste.



Disk Number 1
Photo Number 18
Photo Filename DSCN0873.JPG
Date/Time 7/23/2015
12:15:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. 55-gallon containers of hazardous waste storage. This container did not contain a date of accumulation.



Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 19
Photo Filename DSCN0874.JPG
Date/Time 7/23/2015
12:16:00 PM
Photographer Jamie Paulin

Description

Pit located outside in the Waste Pad Storage Area. The pit collected rain water and was present in case of a spill. Periodically Emco collected the material in the pit for disposal.



Disk Number 1
Photo Number 20
Photo Filename DSCN0875.JPG
Date/Time 7/23/2015
12:17:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. 55-gallon storage of hazardous waste. Two blue 55-gallon containers did not have any labeling; no date of accumulation and no words, "Hazardous Waste."



Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 21
Photo Filename DSCN0876.JPG
Date/Time 7/23/2015
12:20:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. 55-gallon container of hazardous waste did not have a date of accumulation.



Disk Number 1
Photo Number 22
Photo Filename DSCN0877.JPG
Date/Time 7/23/2015
12:23:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. 55-gallon container of hazardous waste was labeled with a date of accumulation of 2/13/15. Mr. Ruszczak explained that Emco has no method of disposing of the hazardous waste.



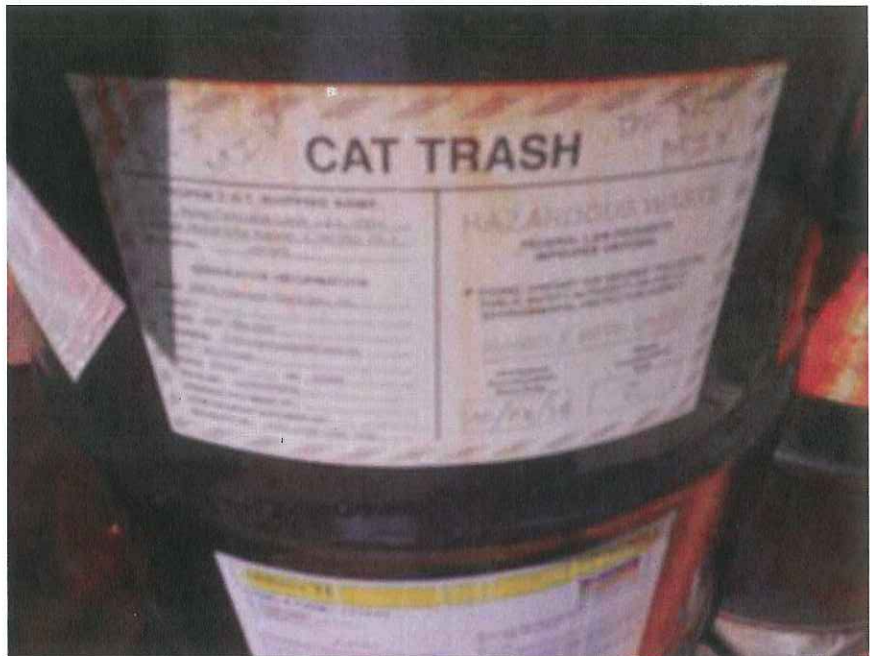
Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 23
Photo Filename DSCN0878.JPG
Date/Time 7/23/2015
12:23:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. 55-gallon container of hazardous waste was labeled with a date of accumulation of 10/28/14. Mr. Ruszczak explained that Emco has no method of disposing of the hazardous waste.



Disk Number 1
Photo Number 24
Photo Filename DSCN0879.JPG
Date/Time 7/23/2015
12:23:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. 55-gallon container of hazardous waste was not labeled with a date of accumulation or the words, "Hazardous Waste," located on the container.



Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 25
Photo Filename DSCN0880.JPG
Date/Time 7/23/2015
12:23:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. 55-gallon container of hazardous waste was not labeled with a date of accumulation or the words, "Hazardous Waste," located on the container.



Disk Number 1
Photo Number 26
Photo Filename DSCN0881.JPG
Date/Time 7/23/2015
12:23:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. 55-gallon container of hazardous waste did not have a date of accumulation.



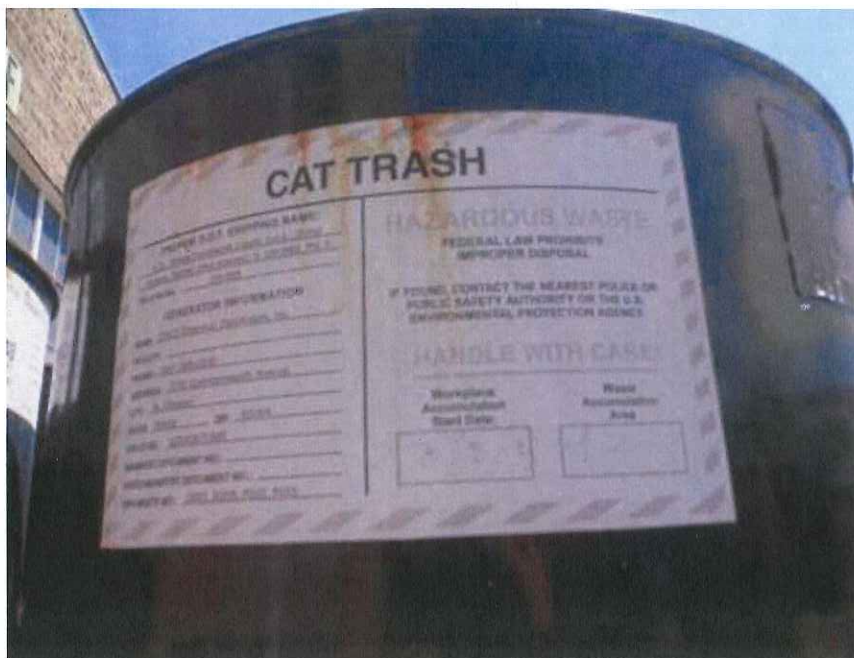
Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 27
Photo Filename DSCN0882.JPG
Date/Time 7/23/2015
12:24:00 PM
Photographer Jamie Paulin

Description

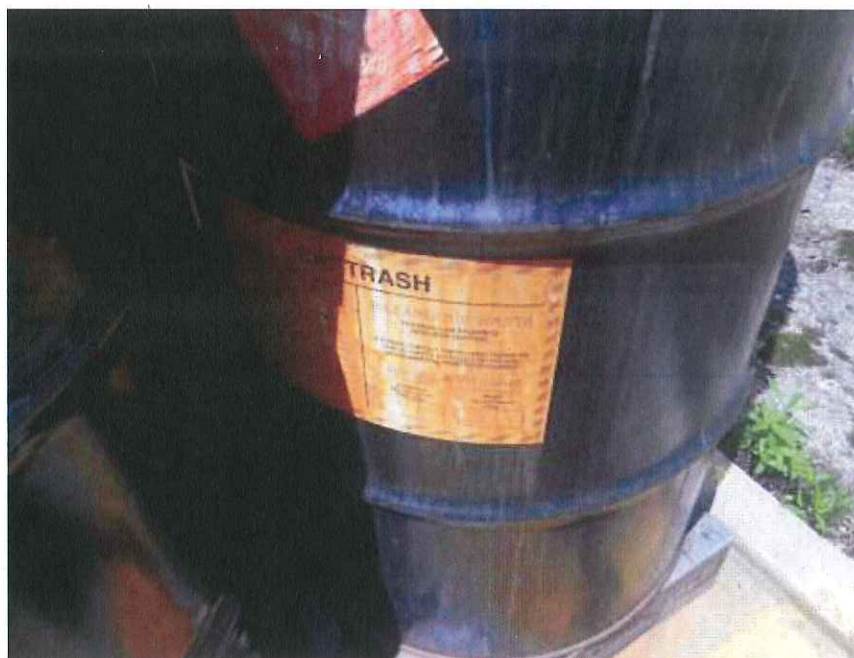
Waste Pad Storage Area. 55-gallon container of hazardous waste was labeled with a date of accumulation of 3/10/15. Mr. Ruszczak explained that Emco has no method of disposing of the hazardous waste.



Disk Number 1
Photo Number 28
Photo Filename DSCN0883.JPG
Date/Time 7/23/2015
12:25:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. 55-gallon container of hazardous waste was labeled with a date of accumulation of 8/21/14. Mr. Ruszczak explained that Emco has no method of disposing of the hazardous waste.



Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 29
Photo Filename DSCN0884.JPG
Date/Time 7/23/2015
12:30:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. Various 55-gallon container storage.



Disk Number 1
Photo Number 30
Photo Filename DSCN0885.JPG
Date/Time 7/23/2015
12:30:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. Six 55-gallon containers were not labeled with a date of accumulation or words, "Hazardous Waste." Emco stated that they were pending analysis to determine if hazardous.



Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 31
Photo Filename DSCN0886.JPG
Date/Time 7/23/2015
12:31:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. 55-gallon container of hazardous waste was labeled with a date of accumulation of 3/10/15, greater than the 90 day storage time allowed.



Disk Number 1
Photo Number 32
Photo Filename DSCN0887.JPG
Date/Time 7/23/2015
12:32:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. Two open 55-gallon containers of hazardous waste were being stored without dates of accumulation. Emco did put a date of accumulation on the containers and lids on at the time of the inspection.



Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 33
Photo Filename DSCN0888.JPG
Date/Time 7/23/2015
12:34:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. Two open 55-gallon containers of hazardous waste were being stored without dates of accumulation. Emco did put a date of accumulation on the containers and lids on at the time of the inspection.



Disk Number 1
Photo Number 34
Photo Filename DSCN0889.JPG
Date/Time 7/23/2015
12:36:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. 55-gallon container storage of sampled product.



Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 35
Photo Filename DSCN0890.JPG
Date/Time 7/23/2015
12:36:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. Nine 55-gallon containers of waste awaiting analysis for hazard determination.



Disk Number 1
Photo Number 36
Photo Filename DSCN0891.JPG
Date/Time 7/23/2015
12:37:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. Totes of hazardous waste from the laboratory were being stored in this location on pallets. No date of accumulation was located on the tote.



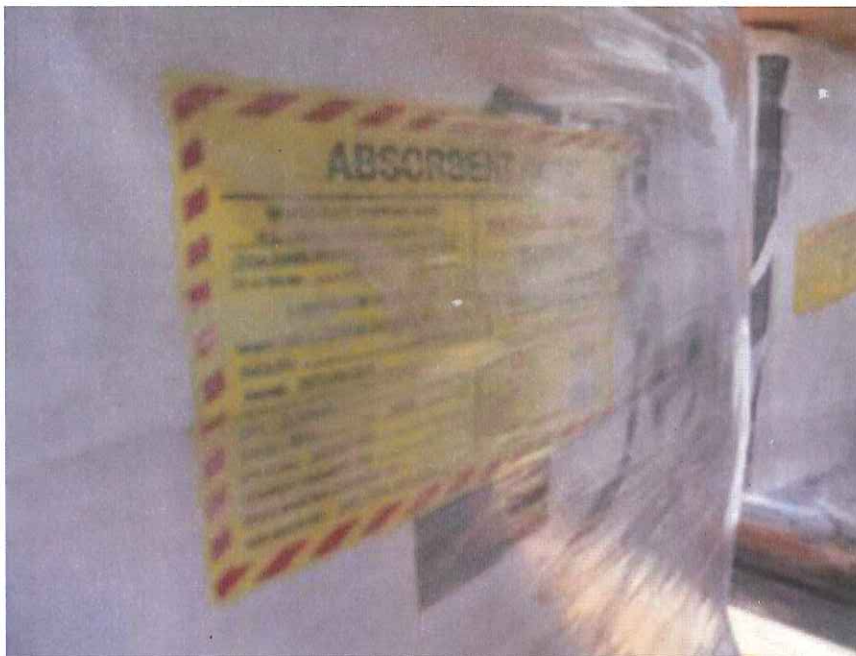
Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 37
Photo Filename DSCN0892.JPG
Date/Time 7/23/2015
12:38:00 PM
Photographer Jamie Paulin

Description

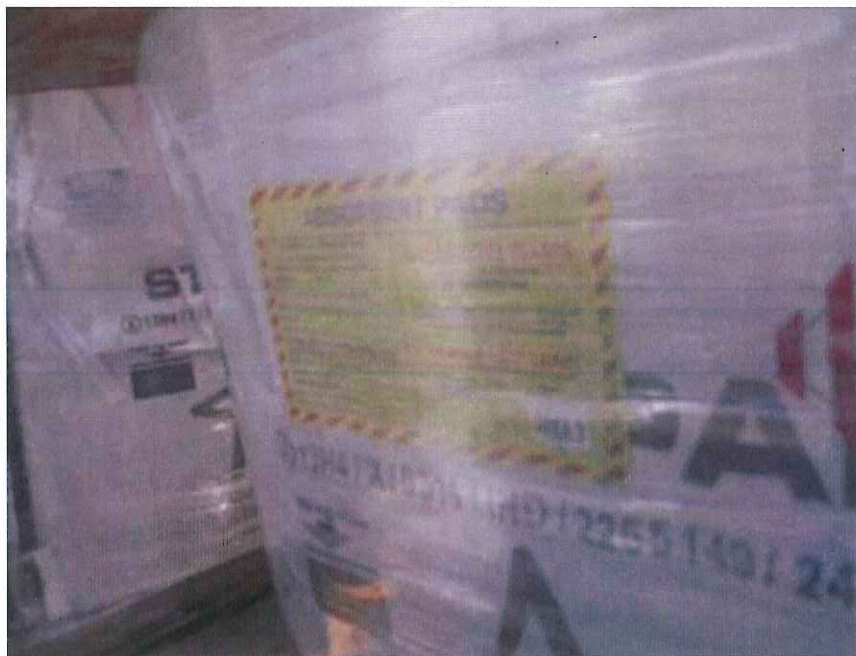
Waste Pad Storage Area. Totes of hazardous waste from the laboratory were being stored in this location on pallets. No date of accumulation was located on the tote.



Disk Number 1
Photo Number 38
Photo Filename DSCN0893.JPG
Date/Time 7/23/2015
12:39:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. Totes of hazardous waste from the laboratory were being stored in this location on pallets. No date of accumulation was located on the tote.



Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 39
Photo Filename DSCN0894.JPG
Date/Time 7/23/2015
12:40:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. Totes of hazardous waste from the laboratory were being stored in this location on pallets. Aisle space was too small for me to fit through to check all of the labels.



Disk Number 1
Photo Number 40
Photo Filename DSCN0895.JPG
Date/Time 7/23/2015
12:42:00 PM
Photographer Jamie Paulin

Description

Overview of Waste Pad Storage Area.



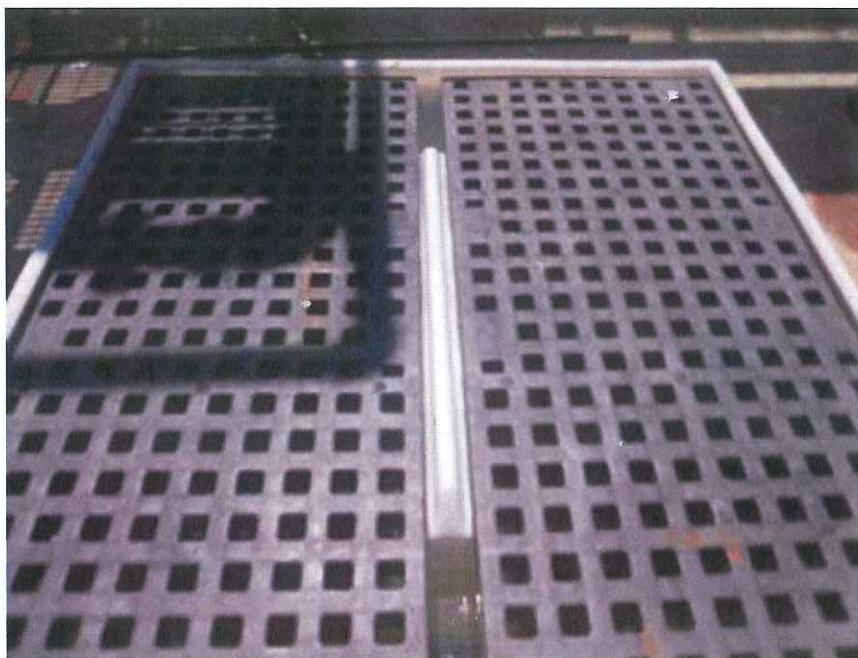
Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 41
Photo Filename DSCN0896.JPG
Date/Time 7/23/2015
12:42:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. Grated pallet used for storage and collection of spills.



Disk Number 1
Photo Number 42
Photo Filename DSCN0897.JPG
Date/Time 7/23/2015
12:43:00 PM
Photographer Jamie Paulin

Description

Pit located outside in the Waste Pad Storage Area. The pit collects rain water and is present in case of a spill. Periodically Emco collects the material in the pit.



Photographs for EMCO Chemical Distributor CEI 7/23/15

Media: RCRA

Disk Number 1
Photo Number 43
Photo Filename DSCN0898.JPG
Date/Time 7/23/2015
12:47:00 PM
Photographer Jamie Paulin

Description

Waste Pad Storage Area. Three 55-gallon containers of wash solvent that Emco will either re-use or sell.



CEI 7/23/15

EMCO Chemical

JLD 005 070 495

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)	
	SUBPART A: GENERAL	
722.111	Section 722.111 Hazardous Waste Determination Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes _____ No <input checked="" type="checkbox"/> N/A _____	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 722? Yes _____ No <input checked="" type="checkbox"/> N/A _____	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	808.121(a)
722.112(a)	Section 722.112 USEPA Identification Numbers Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.112(c)
	SUBPART B: THE MANIFEST	
722.120(a)	Section 722.120 General Requirements Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.120(a)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.120(d)
722.121(a)	Section 722.121 Acquisition of Manifests Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.121(b)
	- an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
722.122	Section 722.122 Number of Copies Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.122
722.123(a)	Section 722.123 Use of the Manifest For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.123(a)
	- obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
	- retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
	- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.123(c)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PRE-TRANSPORT REQUIREMENTS	
722.130	Is there any hazardous waste ready for transport off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.130
	If so, is the generator complying with the pre-transport requirements in Subpart C? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a))	Section 722.134 Accumulation Time Has the generator complied with the following requirements: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
	and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:	
	Does the facility accumulate hazardous waste in containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	If "No", go to Subpart J.	
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
(725.211)	Has the generator closed an accumulation area? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	725.211
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.272)	Is the waste compatible with the container and/or liner? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	
(725.277)	<p>Is the owner/operator complying with the requirements concerning incompatible wastes? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>COMMENTS:</p>	
(725.278)	<p>Section 725.278 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>Comments:</p>	
	<p>Does the generator accumulate and/or treat hazardous waste in tanks? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Note: If "No", go to Subpart C.</p>	
	<p>SUBPART J: TANK SYSTEMS</p>	
	<p>Has the generator closed an accumulation area? Yes _____ No _____ N/A _____</p>	725.211
(725.211) (725.214)	<p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A _____</p>	725.214
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks? Yes _____ No _____ N/A _____</p> <p>Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291(a))	For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A _____	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the wastes? Yes _____ No _____ N/A _____ 3) existing corrosion protection measures? Yes _____ No _____ N/A _____ 4) documented age of the tank system? Yes _____ No _____ N/A _____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A _____ *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A _____ Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes _____ No _____ N/A _____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A _____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A _____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A _____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A _____	
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____ N/A _____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service? Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes _____ No _____ N/A _____</p> <p>or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A _____</p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes _____ No _____ N/A _____</p>	
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <ol style="list-style-type: none"> compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A _____ placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift? Yes _____ No _____ N/A _____ provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A _____ sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A _____ <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A _____</p> <p>Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <ol style="list-style-type: none"> a liner (external to the tank); or a vault; or a double-walled tank; or an equivalent device (approved by the Board)? Yes _____ No _____ N/A _____ 	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) Are welded flanges, joints and connections inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)?</p> <p>Yes _____ No _____ N/A _____</p> <p>Note: If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	
(725.294(a))	<p>Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(b))	<p>Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:</p> <p>1) spill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) overflow prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) sufficient freeboard in uncovered tanks?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(c))	<p>Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.</p>	
(725.295(a))	<p>Does the owner/operator inspect, if present, at least each operating day, the following:</p> <p>1) overflow/spill control equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) the aboveground portion of the tank system for corrosion or releases?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) data from monitoring equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) the construction materials and the area immediately surrounding the external portion of the system?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(b))	<p>If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(c))	<p>Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)?</p> <p>Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	<p>If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:</p> <p>a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A _____</p> <p>b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A _____</p> <p>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A _____</p>	
(725.296(d))	<p>d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A _____</p> <p>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A _____</p> <p>Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.</p>	
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No _____ N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No _____ N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A _____</p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes _____ No _____ N/A _____</p> <p>Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes _____ No _____ N/A _____</p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____ N/A _____</p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes _____ No _____ N/A _____</p> <p>Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system? Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that: - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes _____ No _____ N/A _____</p> <p>- Section 725.117(b) is complied with? Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies? Yes _____ No _____ N/A _____</p>	
(725.298(b))	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes _____ No _____ N/A _____</p>	
(725.299)	<p>Are incompatible wastes/materials placed in the same tank? Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with? Yes _____ No _____ N/A _____</p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes _____ No _____ N/A _____</p> <p>COMMENTS:</p>	
(725.302)	<p>Section 725.302 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>Comments:</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.131)	SUBPART C: PREPAREDNESS AND PREVENTION Is the facility being operated and maintained to minimize the possibility of a fire/explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes _____ No <input checked="" type="checkbox"/> N/A _____	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No _____ N/A _____ b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No _____ N/A _____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No _____ N/A _____ d) water at adequate volume and pressure for fire control? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No _____ N/A _____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.135)	Is the facility maintaining adequate aisle space? Yes _____ No <input checked="" type="checkbox"/> N/A _____	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - agreements with State emergency response teams, contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
(725.151(a))	Is the contingency plan available? Yes <input checked="" type="checkbox"/> No _____ N/A _____ If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/> If "Yes", has the contingency plan been carried out immediately? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - explosions? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - releases? Yes <input checked="" type="checkbox"/> No _____ N/A _____	

Not during inspection

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152(c))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> - police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> - description? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - capability? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - location? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>Is the list of emergency equipment up-to-date?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> - an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.153)	<p>Has the contingency plan (including all revisions) been:</p> <p>a) maintained at the facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) submitted to:</p> <ul style="list-style-type: none"> - police department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - fire department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospital? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <p>a) regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) the plan fails in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>c) the facility changes in a way that modifies the emergency response necessary?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d) information regarding emergency coordinators changes?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>e) information regarding equipment changes?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<p><i>Didn't have records</i></p>
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Note: If the facility has had a release, explain in detail.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p>Section 725.116 Personnel Training</p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - key parameters for automatic waste feed cut-off systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to fire or explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to groundwater contamination incidents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - shutdown of operations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	

2 Not
fire records
were at
available
during
inspection

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	Section 728.107 Waste Analysis and Recordkeeping Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Is the plan on-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Does the plan include a detailed physical and chemical analysis? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes _____ No <input checked="" type="checkbox"/> N/A _____	
722.134(c)	Section 722.134 Satellite Accumulation Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes <input checked="" type="checkbox"/> No _____ N/A _____ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes _____ No <input checked="" type="checkbox"/> N/A _____ If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes _____ No <input checked="" type="checkbox"/> N/A _____ During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes _____ No <input checked="" type="checkbox"/> N/A _____	
722.134(g)	Note: A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled. SUBPART D: RECORDKEEPING AND REPORTING	
722.140(a)	Section 722.140 Recordkeeping Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.140(d)
722.141(a)	Section 722.141 Annual Reporting Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No _____ N/A _____ Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	722.141(a)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.142(a)(1)	Section 722.142 Exception Reporting If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.141(b)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.142(a)(1)
722.143	Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.142(a)(2)
722.150	SUBPART E: EXPORTS OF HAZARDOUS WASTE Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.143
722.160	SUBPART F: IMPORTS OF HAZARDOUS WASTE Is the generator an importer of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.150
722.170	SUBPART G: FARMERS Is the generator a farmer? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> COMMENTS:	722.160
		722.170

Production Area	Description	Area Requested From	Date Received	EPA Document Number	CBI Claimed	Pages Obtained
General	Copies of IEPA Hazardous Waste Reports; 2012, 2013 and 2014	Records	10/29/2015	JP-EM-01-15	No	60
General	Copy of Hazardous Waste Training Binder	Records	10/29/2015	JP-EM-02-15	No	147
General	Copy of Training Records	Records	10/29/2015	JP-EM-03-15	No	3
General	Hazardous Waste Management Job Descriptions	Records	10/29/2015	JP-EM-04-15	No	4
General	Copy of North Chicago Contingency Plan	Records	10/29/2015	JP-EM-05-15	No	74
General	Copy of EMCO letter to North Chicago Fire Department	Records	10/29/2015	JP-EM-06-15	No	2